

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

WILLIAM VEAL,

Plaintiff,

v.

COMMISSIONER OF BOSTON
CENTERS FOR YOUTH & FAMILIES,
CITY OF BOSTON, MARTIN JOSEPH
WALSH, WILLIAM MORALES,
MICHAEL SULPRIZIO,
LORNA BOGNANNO, THOMAS BOWE
C.P.A. PC, THOMAS BOWE, BONNIE
WALLACE, JOHN DOE and JANE DOE.

Defendants.

CIVIL ACTION NO.: 1:21-CV-10265-MBB

AFFIDAVIT OF BONNIE MINES WALLACE

I, Bonnie Mines Wallace, hereby state and depose as follows:

1. I am one of the named defendants in this lawsuit.
2. I worked for Mattapan Community Center Inc. ("MCCI") since 2003 or 2004 as a bookkeeper.
3. During that time, I also held a full-time position in the payroll department of the City of Boston. I am currently the Director of Payroll.
4. My duties as a bookkeeper were to review statements, record financial activities, prepare reports, and check for discrepancies in MCCI's accounts.
5. I never entered into, or had the authority to enter into, a contract with Mr. Veal for a zero-dollar lease/ contract, or have knowledge of such contract.
6. The only relationship between Mr. Veal and myself stemmed from my position as a bookkeeper for MCCI, the nonprofit corporation headed by Mr. Veal.

7. In or about February 2017, while performing my duties as MCCI's bookkeeper I noticed that the savings account was short about \$100,000.00.

8. I inquired about the discrepancy with both Mr. Veal and another board member. I received no response from them as to what caused it or how it should be reported.

9. After not receiving a response, I presented my report with the discrepancy to MCCI's CPA, Mr. Bow, who is also a defendant in this matter.

10. My involvement with the discrepancy ended after I submitted my report to Mr. Bow.

11. I was asked on two occasions by William Morales and Lorna Bognanno about the discrepancy and I told them I did not know how it came about.

12. I was not privy to or had any conversation or involvement in the City of Boston's or any other party's decision to disassociate the City of Boston from MCCI.

13. The work I completed on behalf of MCCI was completed in my capacity as its employee, and not in my capacity as a City of Boston payroll department employee.

14. At no time while working as an employee of MCCI, did I perform any duties or undertake any tasks in my capacity as a City of Boston payroll department employee.

Sworn to under the pains and penalties of perjury, this 7th day of May, 2021.

Bonnie Mines-Wallace

Bonnie Mines Wallace